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April 2, 2019

BY ECF

Honorable Vernon S. Broderick
United States District Court Southern
District of New York
40 Foley Square
New York New York 10007

Re: Great Western Insurance Co. v. Mark Graham, et al., Case No. 18-06249
(VSB)

Dear Judge Broderick:

We are the attorneys for defendant Mark Graham and defendant-entities Blue Capital Management, Inc., Blue Alternative Asset Management, LLC, Blue Elite Fund, Ltd., Blue Elite Fund, L.P., and Blue II, Ltd. (together, the “Blue Defendants”), in the above-referenced case.

Under Rule 4.J of Your Honor’s Individual Rules & Practices in Civil Cases, the Blue Defendants respectfully request oral argument in connection with their Motion to Dismiss Great Western Insurance Company’s Second Amended Complaint (ECF No. 125).

We thank the Court for its courtesy in considering this application.

Respectfully submitted,

/s/ Eric R. Breslin
Eric R. Breslin

cc: All Counsel of Record (by ECF)

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